REMARKS

This is in response to the Office Action mailed February 6, 2003. Applicant respectfully traverses and request reconsideration.

Claim 8 currently stands rejected under 35 U.S.C. §112, 2nd ¶ as being indefinite for failing to particularly point out indistinctly claimed subject matter regarded as the invention. Applicant respectfully traverses this rejection and submits that claim 8, as originally presented, provides proper definite concise claim language regarding the claimed selection signals. Although, in order to expedite the prosecution of the present application, Applicant respectfully submits, for the Examiner's consideration, amended claim 8 adding in the modifier of "at least one" selection signal to overcome any Examiner-noted confusion. It is respectfully submitted that this amendment is not narrowing in nature or directly related to patentability, but rather a further delineation of inherently contained features already claimed therein. Should the Examiner feel that this amendment is narrowing in nature or directly related to patentability, Applicant respectfully requests a statement by the Examiner asserting this position. As such, Applicant requests reconsideration and withdrawal of the present rejection.

Claims 1-6, 8-9 and 20-22 currently stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,388,648 (hereinafter referred to as "Clifton"). Applicant respectfully traverses and requests reconsideration.

Clifton is directed to, *inter alia*, a color gamma luminance matching technique for use with an image display system. More specifically, Clifton discloses, *inter alia*, utilizing a plurality of LCD projection units having luminance and color balance systems employing an LCD array characterization look up table storing multiple sets of luminance and gamma correction values selectable to control luminance and color balance. Color gamma correction systems are combined with luminance and color balancing systems to match primary colors in addition to white and luminance values. The combined systems provide suitable color matching for an image, solving problems associated with a multi-screen display system. Using a color mixing method, primary colors are adjusted and a primary color matching algorithm involves

measuring intrinsic color coordinates of primary colors, for determining a set of predetermined target coordinates and performing matrix operations to calculate the set of co-efficients used in a color space conversion circuit to convert measured to target coordinates, thereby matching primary colors.

Claim 1 is directed to a gamma correction circuit including, *inter alia*, a plurality of gamma correction look-up tables and a gamma table selector. Moreover, the gamma correction circuit of claim 1 provides that each of the plurality of look-up tables provides a set of output data in response to received input data and the gamma table selector receives the set of output data and selects the set of output data corresponding to one of the plurality of look-up tables based on gamma selection information.

In support of the present rejection regarding claim 1, the Examiner recites these limitations as being disclosed by Clifton on col. 10, lines 21-27, which reads as follows:

> A controller 101, such as the above-described processor, is employed to manually or automatically select from among the sets of look-up tables. Look-up table 100 receives the R, G, and B, digital input data and converts it to corrected data values in accordance with the selected sets of look-up table values.

In support of the present rejection, the Examiner asserts that Clifton discloses the claimed gamma table selector through the disclosure of the controller 101, to which Applicant respectfully traverses. Regardless thereof, the controller "selects from among the sets of look-up tables," but fails to, *inter alia*, **receive the set of output data**. Rather, Fig. 8 clearly illustrates the controller 101 providing a control signal (not labeled) to the lookup table 100, but the controller **does NOT** receive the set of output data. In fact, it is submitted that Clifton fails to disclose of a selection unit that receives a set of output data such that a selection operation may be performed thereon. The Examiner-cited passage succinctly discloses the controller 101 choosing from among the tables, but does not disclose receiving the set of output data, wherein the output data is gamma corrected input data.

Furthermore, on page 3 of the present Office Action, the Examiner asserts that "the automatic selection of the set of output data is based on gamma selection information (col. 10, lines 21-24)," to which Applicant respectfully traverses. As noted in the above recited passage,

Clifton fails to disclose, *inter alia*, the gamma table selector selecting the set of output data corresponding to one of the plurality of look-up tables based on gamma selection information. Rather, Clifton succinctly discloses a controller 101 to select from the sets of look-up tables. Furthermore, FIG. 8 merely illustrates the controller 101 providing an input signal (not labeled) to the look-up table 100. In the present application, the gamma selection information is clearly disclosed and delineated as information directed to the proper corrective gamma correction required to provide for a gamma corrected output. As discussed above, Clifton is directed to gamma and luminance matching techniques for an image display system and does not provide for gamma selection information to provide for varying levels of gamma correction but is rather concerned with luminance and color balance ratio for a multi-display output.

It is respectfully submitted that Clifton operates in a completely different manner by not using gamma selection information by a gamma table selector to select one of the plurality of look-up tables wherein the output data is received by the gamma table selector and produces a completely different result which is corrected data values that provide corresponding voltages that are conditioned by an LCD driver amplifier and converted to R, G, and B input voltages received by an LCD array. As such, Applicant respectfully submits that Clifton fails to disclose all of the claimed limitations and therefor fails to anticipate the claimed present invention of claim 1. As such, Applicant requests reconsideration and withdrawal.

Should the Examiner maintain the present rejection, Applicant respectfully requests a showing, including specific column and line numbers, of where Clifton explicitly discloses, *inter alia*, "a gamma table selector **that receives the set of output data** and automatically selects that set output data corresponding to one of the plurality of lookup table, wherein the automatic selection of the set of output data is **based on gamma selection information**." (emphasis added).

Regarding claims 2-5, Applicant respectfully submit that these claims contain further patentable subject matter in view of Clifton and are allowable not merely as being dependent upon an allowable base claim.

Furthermore, Applicant respectfully submits that the Examiner has failed to provide adequate support regarding the claimed limitation recited in claim 2 where the "gamma correction look-up tables include a pass through function," as in the Examiner has merely cited to FIG. 8, but has not provided any indication as to where in FIG. 8 or where within the accompanying specification the pass through function is specifically discussed. As such, should the Examiner maintain the present rejection regarding claim 2, Applicant respectfully requests a showing, including column and line numbers, of where the specific limitation of "wherein the plurality of gamma correction look-up tables includes a pass through function, wherein the pass through function provides the received input data as a set of output data."

Moreover, regarding claim 4, Applicant respectfully traverses the Examiner's assertion regarding the inherent table selector comprising a multiplexor "because the selector is disclosed as a controller comprising circuitry that performs a selective function." The Examiner cited passage on col. 10 regarding the discussion of the claimed limitations of claims 1, 3 and 4 provide for the controller 101 to select a single look-up table 100 for the conversion of the digital, RGB and input signal. The controller 101 "is employed to manually or automatically select from the sets of look-up tables." It is submitted that the Examiner-cited passage fails to specifically disclose or inherently imply the limitation of multiple gamma correction look-up tables in selecting one of the selected set of output data from the sets of output data based on the gamma selection information, but rather indicates selecting one individual look-up table for converting the digital RGB input signal which is provided to the DAC 102. As such, Applicant requests reconsideration and withdrawal and the passage of these claims to issuance. Should the Examiner maintain the present rejection regarding claim 4, Applicant respectfully requests a showing, including column and line numbers, of where Clifton discloses the generation of multiple look-up table data sets and the selection of the one of the selection of data sets as opposed to the selection of a single look-up table and the generation of a single look-up table data set.

As such, Applicant respectfully requests reconsideration and withdrawal of the present rejection and the passage of claims 2-5 to issuance.

Regarding claims 6 and 8-9, Applicant respectfully resubmits the above position offered with regards to claim 1, specifically that Clifton fails to disclose, *inter alia*, the claimed selection block receives the plurality of gamma corrected data sets and selects a selected set of gamma corrected data based on a gamma selection information. Therefore, for at least the reasons stated above regarding claim 1, Applicant requests reconsideration and withdrawal. Should the Examiner maintain the present rejection, Applicant requests a showing, including specific column and line numbers of where the specific claimed limitations directed to the selection block are disclosed by Clifton.

Regarding claims 20-22, Applicant respectfully submits that Clifton fails to disclose all of the claimed limitations claimed herein. On page 5 of the present Office Action, the Examiner asserts the claimed gamma correction block is disclosed by the teachings of FIG. 8, to which Applicant respectfully traverses. Among other things, as discussed above regarding claim 1, Clifton fails to disclose the claimed "the gamma selection information." As discussed above, Clifton operates in a completely different manner to produce a completely different result, which is a combined luminance and color output array for multiple LCD screens. Furthermore, claims 20-22 recite, *inter alia*, the gamma correction block provides gamma correction data in response to the display information from a gamma correction curve selected by the gamma selection information. It is submitted that Clifton does not disclose the use of gamma correction curves to generate gamma corrected display information, but rather only uses gamma correction curve information in the generation of the lookup tables. While Applicant appreciates the fine distinction between using a gamma correction curve to generate a lookup table wherein the lookup table is used to generate gamma corrected data, claims 20-22 succinctly claim that gamma corrected information is generated based on a gamma correction curve, which is not equivalent to using a lookup table. Among other benefits, using a gamma correction curve eliminates excessive memory requirements associated with storing full lookup tables. Therefore, as Clifton only teaches using a lookup table 100 and not gamma correction curves, it is submitted that Clifton fails to disclose all of the claimed limitations of claims 20-22.

As such, Applicant respectfully requests reconsideration and withdrawal. Should the Examiner maintain the present rejection, Applicant requests a showing, including column and

line numbers of where Clifton discloses the claimed gamma selection information and the gamma corrected data in response to the display information from a gamma correction curve selected by the gamma selection information.

Accordingly, Applicant respectfully submits that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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